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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$25,000.00 IN  
U.S. CURRENCY,

15 Defendant.

1:22-MC-00035-JLT

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17 STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

18 It is hereby stipulated by and between the United States of America and potential claimant Jesus  
Pedro Maldonado Ceja (“claimant”), by and through their respective counsel, as follows:

19 1. On or about December 1, 2021, claimant Maldonado Ceja filed a claim in the administrative  
20 forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately  
21 \$25,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on September 2, 2021.

22 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required  
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
24 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant  
25 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

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27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency

1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
2 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.  
3 That deadline is March 1, 2022.

4       4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to  
5 May 2, 2022, the time in which the United States is required to file a civil complaint for forfeiture against  
6 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8       5. Accordingly, the parties agree that the deadline by which the United States shall be required  
9 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
10 the defendant currency is subject to forfeiture shall be extended to May 2, 2022.

11 Dated: 2/28/2022 PHILLIP A. TALBERT  
United States Attorney

13 /s/ Kevin C. Khasigian  
14 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

16 Dated: 2/28/2022 /s/ Robert L. Forkner  
17 ROBERT L. FORKNER  
18 Attorney for potential claimant  
Jesus Pedro Maldonado Ceja  
  
(As authorized via email)

21 | IT IS SO ORDERED.

22 || Dated: March 3, 2022

Jennifer L. Thurston  
UNITED STATES DISTRICT JUDGE